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September 15, 2020
VIA ECF

Hon. Michael W. Mosman
United States District Judge
Mark O. Hatfield United States Courthouse
Room 1615
1000 Southwest Third Avenue
Portland, Oregon 97204-2945

Re: *Leonard v. Nike, Inc.*, 3:19-cv-01586-MO: Joint Status Report

Dear Judge Mosman:

As counsel for Defendant and Counterclaimant NIKE, Inc. in the above-referenced matter, we write jointly with counsel for Plaintiff and Counterclaim Defendant Kawhi Leonard pursuant to the Court's June 11, 2020 Order. [Dkt. # 80.] In that Order, the Court adopted the parties' proposed case management schedule contained in their Joint Status Report, submitted on June 9, 2020. [Dkt. # 79.] Accordingly, the Court ordered fact discovery to be completed and the parties to file an updated joint status report by September 15, 2020. [Dkt. # 80.]

The parties have recently agreed in principle to the material terms of a confidential settlement agreement that will dispose of this action in its entirety. The parties have exchanged a draft of the agreement and are currently in the process of finalizing the same. In view of the discussions to date, the parties anticipate submitting a joint stipulation and motion for voluntary dismissal of all outstanding claims and defenses within the next 30 days. Accordingly, the parties respectfully request that any further proceedings be held in abeyance while the parties finalize their settlement agreement.

The parties will advise the Court immediately should any unexpected impediments to promptly disposing this action arise. We thank you for your time and attention to this matter.

Respectfully submitted,

DLA Piper LLP (US)

/s/ Tamar Y. Duvdevani

Tamar Y. Duvdevani

cc: Counsel of Record